

**MEMORANDUM**

**TO:** District of Columbia Zoning Commission

**FROM:** Crystal Myers, Project Manager  
*JLS* Jennifer Steingasser, Deputy Director, Development, Design and Preservation

**DATE:** September 8, 2023

**SUBJECT:** **ZC 20-33B:** Further Processing Special Exception and Campus Plan Amendment for the D.C. Archives Building of the University of District of Columbia 2020-2029 Campus Plan

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**I. SUMMARY RECOMMENDATION**

The University of the District of Columbia (“UDC”) submitted, a request for further processing of the 2020 University of the District of Columbia Campus Plan (“Campus Plan”) to construct the District Archives Building, pursuant to Subtitle X § 101, special exception review.

The Office of Planning (OP) recommends **approval** of the following:

1. Amendment to the 2020 UDC Campus Plan to allow demolition of Building 41, and
2. Further processing to authorize the construction of the District Archives Building.

OP notes that the Greener Government Buildings Act will be funded as of FY24 and encourages the applicant to address any applicable changes as noted by DOEE in their comments.

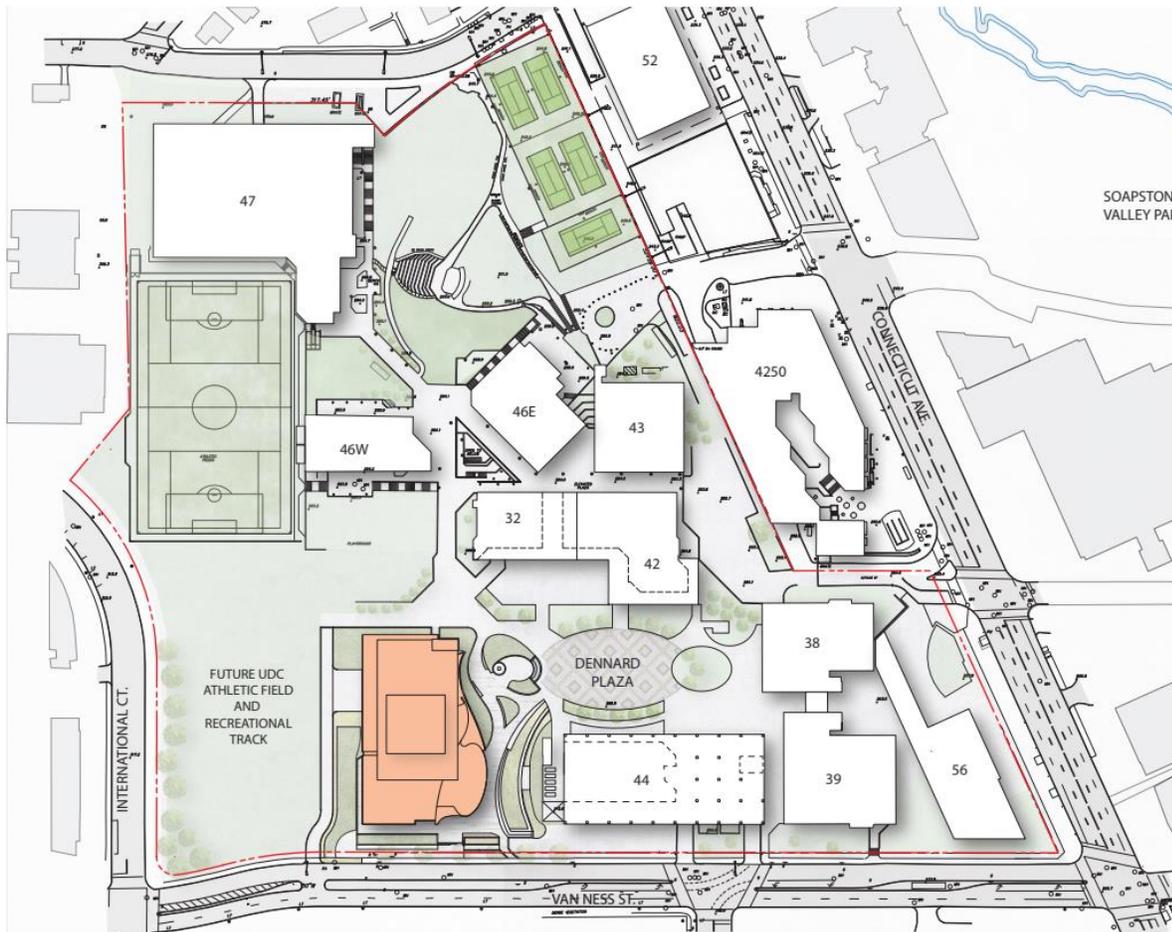
**II. APPLICATION IN BRIEF**

Location	4200 Connecticut Ave. NW
Legal Description	Square 1964, Part of Lot 812
Ward/ANC	Ward 3/ANC-3F
Zoning	R-1-B
Proposal	Further Processing and Special Exception to construct the DC Archives building at UDC.

**III. SITE AND AREA DESCRIPTION**

The DC Archives building would be on UDC’s Van Ness Campus. The Van Ness Campus is located at the intersection of Connecticut Avenue NW and Van Ness Street NW. The campus is bounded by Van Ness-UDC Metrorail station and mixed-use buildings on Connecticut Avenue NW to the east, International Court NW and a portion of International Chancery Complex to the west, Yuma Street NW to the north, and Van Ness Street NW to the south.

The Archives building (shown in orange) would be located on the campus' southwestern corner along Van Ness St. NW and would replace building 41, which is the school's former Arts and Sciences building and library. The site sits between open space to the west and the school's College of Agriculture, Urban Sustainability, and Environmental Science (building 44) to the east. Cleveland Dennard Plaza, which is a large hardscaped plaza is to the northeast of the site.



#### IV. PROJECT DESCRIPTION

This project would replace the 85-foot Building 41 with a new 73-foot DC Archive building with a 13-foot tall penthouse. At 117,790 sq.ft. the new building would be smaller than the existing building's 157,690 sq.ft, which would reduce the floor area ratio (FAR) on the site from 1.37 to 1.32 FAR. The project includes alterations to the parking garage that would reduce the total parking spaces from 715 spaces to 710. Twenty-eight spaces would be reserved for DC Office of Public Records (OPR) staff.

The building's main entrance would face Van Ness St. NW and be adjacent to Dennard Plaza. In order to make the building pedestrian accessible from Van Ness St. NW, the project includes reworking the frontage on Van Ness. This would involve removing the existing parking garage ramp, re-grading the area, and replacing it with new steps and a new ramp.

Inside the building there would be four levels. The first level would have a multipurpose room, exhibit space and research facilities and these areas would be available to UDC staff and students. The first level would also include digital storage space and the building's lobby. The second level would have office space for archival staff and a processing room for UDC archival collections, including the Felix E. Grant Jazz Archives. The third level would have office space, workstations, a pantry area for facility staff. It would also have a record processing area and storage space. The fourth level would be the location of the DC Records Center, office space for Records Center staff and a research area.

Mechanical equipment and screening, solar panels, and green roof space would be on the penthouse level.

### ***Design Flexibility***

This Further Processing includes a request for these design flexibility items:

- a. To vary the location and design of all interior components, including partitions, structural slabs, doors, hallways, columns, stairways, and mechanical rooms, provided such variations do not change the exterior configuration or appearance of the building;
- b. To vary the final selection of the colors of the exterior materials, based on availability at the time of construction, provided such colors are within the color ranges shown on the architectural plans approved by the Commission;
- c. To make minor refinements to exterior façade details and dimensions, including curtain wall mullions and spandrels, window frames, glass types, belt courses, sills, bases, cornices, balcony railings and trim, or any other changes, providing such minor refinements do not substantially alter the Architectural Plans approved by the Commission and are necessary to comply with the District of Columbia Building Code or that are otherwise necessary to obtain a final building permit;
- d. To vary the location, attributes and general design of the streetscape incorporated in the project to comply with the requirements of and the approval by the D.C. Department of Transportation's Public Space Division;
- e. To vary the final landscaping dimensions and materials as shown on the Architectural Plans based on either (i) availability and suitability at the time of construction, or (ii) in order to satisfy permitting requirements of the D.C. Department of Energy and Environment; and
- f. To refine the Project's roof level to incorporate elevator roof access in place of roof hatches as reflected in the Architectural Plans, provided any elevator access will comply with all requirements of the Zoning Regulations.

OP does not object to this requested flexibility.

## **V. AMENDMENT TO 2020 UDC CAMPUS PLAN**

The 2020-2029 UDC Campus plan intended for Building 41 to be consolidated into an archive building:

*Building 41 - College of Arts and Science / Library*

- *The University will continue to relocate occupants from Building 41 to other locations.*
- *There are two potential outcomes for Building 41:*
  1. *Decommissioned and District archives will be consolidated into Building 41; or*
  2. *Rehabilitated for use as academic space.*

An amendment to the 2020 campus plan is needed because construction of the District archives building involves demolishing the existing building 41. The applicant states that consolidating the DC Archives into the existing Building 41 is not a feasible option for the project. Building 41 is in poor condition and its' structure is not suited to modern archival storage requirements. An archival building requires a strong temperature control system and 20-ft floor to floor heights and Building 41's existing floor-to-floor heights of 14feet 8inches and 12 feet 8inches, would not be sufficient. The new archival building would also need a new HVAC system and thermal insulation. Furthermore, building 41's octagonal shape would result in inefficient floor space that would make compact mobile storage equipment difficult to use. The applicant concluded that the cost to renovate Building 41 to accommodate the DC Archives would be too high for the project to proceed.

## **VI. FURTHER PROCESSING OF A CAMPUS PLAN**

### ***101.1 Education use by a college or university shall be permitted as a special exception subject to review and approval by the Zoning Commission under Subtitle X, Chapter 9 after its determination that the use meets the applicable standards and conditions of this chapter.***

The education use was approved through the 2020 University of District Columbia Campus Plan approved by Commission on July 26,2021. The Final Order for the approved campus plan is provided at [Exhibit 3F](#). Conclusions of Law Number 1 states:

The Commission finds that the 2020 Plan meets the applicable campus plan requirements of the Zoning Regulations, based on the Applicant's Statement and the additional supplemental documents the Applicant submitted to the case record. The Commission concludes that the information provided in the case record and during testimony at the public hearing is sufficient for the Commission to find that the objectionable impacts associated with the 2020 Plan are capable of being mitigated. Therefore, the Commission concludes that the Applicant has met the burden of proof for approval of the 2020 Plan.

The DC Archive building would store UDC's archival collection. It would provide research opportunities for UDC staff and students. It could provide internship, work study and training opportunities for students interested in archivists work. Locating the District

archives on campus would also allow students to have opportunities to get hands-on experience working with documents and artifacts.

***101.2 The uses shall be located so that they are not likely to become objectionable to neighboring property because of noise, traffic, parking, number of students, or other objectionable conditions***

Noise

The DC Archives building should not generate a significant amount of objectionable noise. The building would primarily serve as a place to store documents, art, and artifacts and to provide a quiet space for research. The first level of the building would be more active with a modestly sized exhibit space where events could be held. These events would likely be mainly seminars and lectures within the building, which should not result in objectionable noise levels. This is especially true because the building would not be near any residential properties. The nearest neighboring properties are embassy buildings that are across the 90-ft-wide Van Ness St. NW and embassy buildings along International Ct. to the west which will have a new athletic field between them and the site in the future.

Traffic, Parking, and Loading

The DC Archives building should not result in an objectional impact on traffic and parking. The Applicant expects there would be 25 permanent archives staff in the building each day and approximately 30 daily visitors. This number of visitors is less than the number of daily students that used Building 41 when it had Arts and Sciences classes and a library. The Applicant expects larger-scale events to occur approximately two to three times a month. The proposed parking and public transit should be sufficient to accommodate these events.

Parking in the garage would be reduced from 715 to 710 spaces and 28 spaces would be dedicated to DC Office of Public Records staff and DC Government vehicles. Otherwise, the garage spaces would continue to be open to the public and provide parking for all Campus uses. UDC is also adjacent to the UDC Metrorail station and Metrobus stops, which minimizes parking demand on the site.

The DC Archives building's loading activities should not have an objectional impact. Up to four loading deliveries are expected each day. This includes trash deliveries as well as records, arts, and artifacts. The building would have two loading berths and service berth with a dedicated access road so there should be no impacts on Van Ness Street NW.

A more detailed analysis and recommendation regarding the project's traffic, parking, and loading impacts will be provided in the Dept. of Transportation's report.

Number of Students

The addition of the DC Archives building on campus would not have an impact on the number of students on campus. Furthermore, the DC Archives building's exhibit space and research center should not draw more students to the southwestern side of campus than Building 41, when it was being used as an Arts and Sciences building with a library.

**101.3 Any commercial use customarily incidental to a university use in an R, RF, or RA zone, or as an adjunct use to a university building, shall be subject to the following conditions:**

Not Applicable. There is no commercial use included in this project.

**101.4 The campus plan process shall not serve as a process to create general commercial activities or developments unrelated to the educational mission of the applicant or that would be inconsistent with the Comprehensive Plan.**

Not Applicable. There is no commercial use included in this project.

**101.5 The following development standards shall apply to the maximum total density of all buildings and structures on the campus in an R, RF, RA, or RC-1 zone:**

**TABLE X § 101.5: MAXIMUM TOTAL DENSITY OF ALL BUILDINGS AND STRUCTURES**

Zone	Maximum Height (Feet)	Maximum Floor Area Ratio
<b>All R and RF zones</b>	<b>50</b>	<b>1.8</b>

The District archives building would be smaller than the existing building. Replacing the existing Building 41 with this new building would reduce the total FAR on campus from 1.37 to 1.32. This would be within the 1.55 FAR approved in the Campus Plan and the 1.8 FAR allowed in the R-1-B zone.

As for height, the new building would be 73ft, which is less than the existing building's 85ft but more than the 50-ft maximum stated in this section.

D § 207.6 allows for institutional buildings to have a height of up to 90 feet if they are set back a foot for every one foot beyond the 50-ft setback requirement.

*An institutional building or structure may be erected to a height not exceeding ninety feet (90 ft.); provided, that the building or structure shall be removed from all lot lines of its lot a distance of not less than one foot (1 ft.) for each one foot (1 ft.) of height in excess of that authorized in the district in which it is located.*

(D§ 207.6)

In this case, the building would be set back approximately 52ft. 10in from Van Ness St. NW, which is more than the 23 ft needed to comply.

**101.6 Because of permissive increases as applicable to normal bulk requirements in the low-density zones regulated by this title, it is the intent of this subsection to prevent unreasonable campus expansion into improved low-density zones.**

The project would lower the existing FAR on campus from 1.37 to 1.32. This is within the approved Campus Plan FAR of 1.55.

***101.7 In calculating floor area ratio (FAR), the land area shall not include public streets and alleys, but may include interior private streets and alleys within the campus boundaries.***

The FAR calculation does not include public streets and alleys.

***101.8 As a prerequisite to requesting a further processing for each college or university use, the applicant shall have submitted to the Zoning Commission for its approval a plan for developing the campus as a whole, showing the location, height, and bulk, where appropriate, of all present and proposed improvements including, but not limited to, the following:***

- (a) Buildings and parking and loading facilities;***
- (b) Screening, signs, streets, and public utility facilities;***
- (c) Athletic and other recreational facilities; and***
- (d) A description of all activities conducted or to be conducted on the campus, and of the capacity of all present and proposed campus development.***

UDC previously submitted a campus plan application, which was approved by the Zoning Commission on July 26, 2021. The Final Order for the approved campus plan is provided at [Exhibit 3F](#).

***101.9 The further processing of specific buildings, structures, and uses within an approved campus plan shall be processed as a special exception unless the campus plan approval was included in an order granting a first-stage planned unit development (PUD) for the campus, in which case the further processing shall be in the form of second-stage planned unit development applications filed consistent with the conditions of the approved campus plan/PUD.***

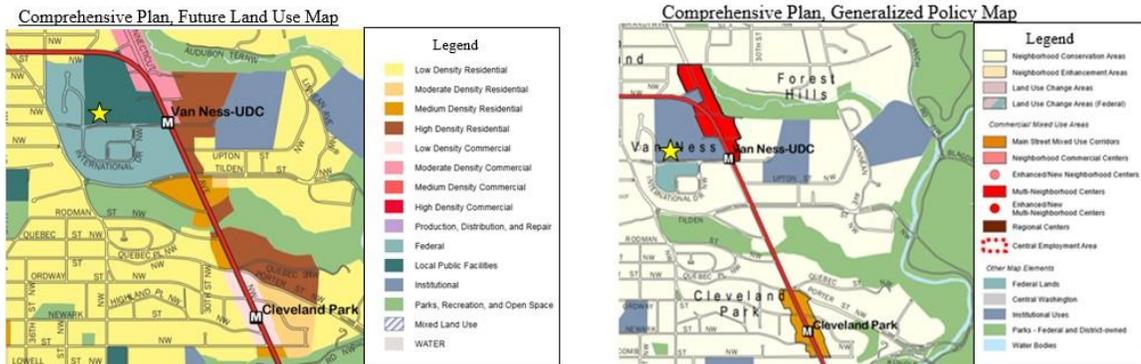
The proposed further proposed is being reviewed as a special exception. UDC is not subject to a PUD.

***101.10 Within a reasonable distance of the college or university campus, and subject to compliance with Subtitle X § 101.2, the Zoning Commission may also permit the interim use of land or improved property...***

Not Applicable. No interim off-campus use of land is proposed.

***101.11 In reviewing and deciding a campus plan application or new building construction pursuant to a campus plan, the Zoning Commission shall consider, to the extent they are relevant, the policies of the District Elements of the Comprehensive Plan.***

## Comprehensive Plan



The 2021 Comprehensive Plan Future Land Use Map identifies the entire UDC Van Ness campus for Local Public Facilities use, which “...includes land and facilities occupied and used by the District of Columbia government or other local government agencies...excluding parks and open space. Uses include public schools...public hospitals, government office complexes and similar local government activities,” (227.17). The DC Archives building would not be inconsistent with this designation.

The Generalized Policy Map designates the entire campus for Institutional use, which includes colleges and universities. The DC Archives building would not be inconsistent with this designation.

## Racial Equity Analysis

The Implementation Element calls for “the Zoning Commission to evaluate all actions through a racial equity lens as part of its Comprehensive Plan consistency analysis”<sup>2501.8</sup>. The Commission’s racial equity tool serves as a guide in analyzing the Comprehensive Plan and considering potential impacts of the proposal. The tool starts by asking “What is the expected goal of the zoning action?” and then “What are the anticipated positive and negative impacts and/or outcomes of the zoning action?” The DC Archives building would not displace any residents or students. It would also not impact the demographics of the area or student enrollment.

### Part 2- Community Outreach

- In 2020 UDC conducted surveys of their students, the neighbors, and Ward 3 residents to assess overall views of the Campus and on the objectives of the master planning process. The information provided in the responses informed the development of the campus plan and the plans for the DC Archives building on the site.

- D.C. Council created the Archives Advisory Group to advise the Council on the Project and Office of Public Records (OPR) began regularly meeting with the group in 2022.
- OPR regularly met with the Archives Advisory Group hosted a public design discussion regarding the DC Archives building on April 5, 2023
- In July 13, 2023 the Applicant and OPR presented the project to the UDC-community Task Force.
- The Applicant and OPR also attended the ANC's public meeting on July 18, 2023 and responded to questions about the project.

The community expressed strong concern over project's plans to close the approximately 6,160 sq.ft of community garden adjacent to Building 41. ([Community Gardens Diagram](#)) According to the Applicant the space occupied by the garden is needed for the project's bioretention area. The Applicant plans to relocate 1,785 sq.ft of the community garden to a space north of the site. They are working with UDC to identify where the remaining 4,375 sq.ft can be relocated on campus.

### Part 3 - Disaggregated Data Regarding Race and Ethnicity

The proposal is not for residential use and therefore Part 3 is not relevant to the further processing for the DC Archives building.

### The Project's Potential Impact on Racial Equity

UDC is a Historically Black College/University (HBCU) and the only public university in the District of Columbia. The school has a majority minority student population with 55% of the students being Black, 22.8% being Hispanic, 6.5% being White, and 2.4% being Asian as of Spring 2023. Locating the DC Archives building at the UDC campus would help to make the DC Archives programs and research opportunities accessible to more minority students in the District.

Though UDC is in Rock Creek West, which is not an underserved area, it is an underinvested campus. Locating the DC Archives on this campus would also be a positive investment in a school that has suffered from underinvestment for years. Replacing an old out-of-date building with the new state-of-the-art DC Archives building would be positive update for the UDC campus. It would also be in line with the Community Services and Facilities Element's policy and Overview statement:

***Policy CSF-1.1.8: Public Facilities, Equity, and Economic Development***  
*Locate new public facilities to best serve all District residents and to*

*support economic development and neighborhood revitalization efforts, with a focus on underserved areas and areas of growth. 1103.19*

**Overview statement...** *A well-balanced and adequate public facility system is a key part of Washington, DC's drive to sustain and enhance the quality of life for its residents and to deliver services on an equitable and inclusive basis, supporting growth and prosperity, resilience, public health and safety, civic gathering, learning, and cultural production and expression. 1100.1*

## **Comprehensive Plan Written Elements**

### Community Services and Facilities

#### **Policy CSF-1.1.9: Co-Location**

*Encourage the strategic co-location of public municipal uses on publicly-owned and controlled sites, provided that the uses are functionally compatible with each other and the site's future land use designation. Consider co-location of private and public uses as a strategy that can help advance District-wide and neighborhood priorities, such as the creation of affordable housing and equitable access to services. 1103.20*

#### **Policy CSF-1.1.10: Agency Coordination for Co-Location Strategies**

*The Public Facilities Plan should include interagency coordination for co-location of public uses early in planning and project initiation processes so that critical input is captured and incorporated. Joint planning of District-operated facilities with other community facilities... should also be supported through ongoing communication and collaboration among relevant District agencies and outside agencies and partners.*

The proposed location of the DC Archives building would also further these Community Services and Facilities policies in the Comprehensive Plan. These policies encourage District agencies to co-locate community facilities that are compatible with each other. The Applicant worked with UDC to locate this new DC Arrives building on campus. This co-location would benefit the school, its students, and the DC Archives program.

### Education

#### **Policy EDU-3.1.1: Sustaining and Advancing UDC**

*Sustain, promote, and advance the University of the District of Columbia and the Community College of the District of Columbia as the city's only public institution of higher learning and continuing education for District residents. 1212.2*

#### **Policy EDU-3.2.4: Universities as Community Partners**

*Encourage universities to expand service-oriented partnerships that connect students with local communities and that can strengthen town-gown relationships. 1213.5*

***Policy EDU-3.2.5: University Research Partnerships***

*Encourage universities to conduct research in a manner that partners students and faculty with members of the local community to help inform thinking on community-driven topics. 1213.6*

***Policy EDU-3.3.2: Balancing University Growth and Neighborhood Needs***

*Encourage the growth and development of local colleges and universities in a manner that recognizes the role these institutions play in contributing to the District's character, culture, and economy, and that is also consistent with and supports community improvement and neighborhood conservation objectives. Discourage university actions that would adversely affect the character or quality of life in surrounding residential areas. 1214.7*

***Policy EDU-3.3.8: Innovative Approaches for Augmented Educational Opportunities***

*Support the growth of the District's learning landscape, including, but not limited to, that of universities, museums, and public facilities that offer innovative approaches for providing learning opportunities to augment in-classroom education. 1214.13*

***Policy EDU-3.3.11: Access to Recreational, Educational, and Cultural Opportunities***

*Support continued access by local neighborhoods to university offerings, such as concerts and lectures, campus green space, continuing education, and low-cost programming for older adults. Encourage residents to learn about and appreciate campus culture. 1214.16*

The DC Archives building would further these Education Element policies in the Comprehensive Plan. The building would hold exhibits, lectures, and other activities that would provide learning opportunities for District residents. Its location on UDC campus would help to promote and advance UDC as an educational institution. As a state-of-the-art facility it would highlight the importance of UDC as a fixture in the community. UDC students would benefit from having the DC Archives on campus because it would provide them access to archival records and opportunities for research.

Urban Design

***Policy UD-4.2.2: Engaging Ground Floors***

*Promote a high standard of storefront design and architectural detail in mixed-use buildings to enhance the pedestrian experience of the street. Promote a high degree of visual interest through syncopated storefronts that vary every 20 to 30 feet, provide direct lines of sight to interior social spaces, provide socially oriented uses along the public street, and use tactile, durable materials at the ground level. 918.4*

***Policy UD-4.2.3: Continuity and Consistency of Building Frontages***

*Maintain the established frontage lines of streets by aligning the front walls of new construction with the prevailing facades of adjacent buildings. Avoid placing new construction that extends beyond the existing facade line unless it significantly benefits the public life of the street. Where existing facades are characterized by an established pattern*

*of windows and doors or other elements, new construction should complement the established rhythm. 918.5*

The DC Archives building would further these Urban Design Element policies in the Comprehensive plan. The building would have a memorable appearance at the ground floor level with its entrance having a one-story elliptical drum that enlarges to a three-story curvilinear window wall facing Dennard Plaza. A two-story glass feature would be to the west of the entrance. The new building would be aligned with the neighboring existing buildings on Van Ness St. NW so that it should not disrupt the established pattern along the street.

### Environment

#### ***Policy E-3.2.7: Energy-Efficient Building and Site Planning***

*Include provisions for energy efficiency and for the use of alternative energy sources in the District's planning, zoning, and building standards. Encourage new development to exceed minimum code requirements and contribute to energy efficiency and clean energy goals. 612.9*

The DC Archives building would further this policy in the Comprehensive Plan. The building would utilize energy efficient design features. This includes low-low features, mechanical systems, green roof areas, and rooftop solar panels. The building would be designed to achieve LEED Gold certification.

The Department of Energy and Environment (DOEE) has indicated in their comments that the building may not comply with the District's new Greener Government Buildings Act which requires government buildings be designed to Net-Zero energy standards. The Greener Government Buildings Act is funded in the FY24 Budget Support Act, which begins on October 1, 2023. The Applicant asserts the new law does not apply to this project because the law is unfunded at this time. The Applicant should work with DOEE and Department of Building to clarify if the new law applies. If the law is applicable the Applicant should revise the design of the building as applicable. DOEE full comments are provided in 101.13 below.

### Rock Creek West Element

#### ***Policy RCW-1.1.6: Metro Station Areas***

*Recognize the importance of the area's five Metro stations to the land use pattern and transportation network of Northwest Washington and Washington, DC as a whole. Each station should be treated as a unique place and an integral part of the neighborhood around it. Mixed-use redevelopment at the area's Metro stations should prioritize the production of affordable and moderate-income housing and retail uses in a manner consistent with the Future Land Use Map, the Generalized Policy Map, and the policies of the Comprehensive Plan. Design context-specific transitions to be more aesthetically pleasing from development along the avenues to nearby low-scale neighborhoods. 2308.7*

***Policy RCW-2.3.5: UDC and Van Ness Community***

*Continue to enhance coordination and communication between UDC officials, Van Ness Main Street, and the surrounding Van Ness community on issues such as parking, traffic, property maintenance, and facility development. UDC and community stakeholders should collaborate to leverage the university's cultural resources and promote activities that can enliven the street and serve the community. 2313.9*

The proposed DC Archives building would further these Rock Creek West Area policies in the Comprehensive plan. It would be consistent with the property's Future Land Use designation of Local Public Facility and the Generalized Policy designation of Institutional. Having the proposed DC Archives building on UDC's campus would enhance the research and academic opportunities. It would also add to visual character of the campus without disrupting the character of the surrounding Van Ness community.

***101.12 As an integral part of the application requesting approval of new building construction pursuant to a campus plan, the college or university shall certify and document that the proposed building or amendment is within the FAR limit for the campus as a whole, based upon the computation included in the most recently approved campus plan and the FARs of any other buildings constructed or demolished since the campus plan was approved.***

The proposed DC Archives building would replace the larger existing building on the site so it would reduce the total FAR on campus from 1.37 to 1.32. This would be within the 1.55 FAR approved in the Campus Plan. No other building has been constructed since the campus plan was approved.

***101.13 Pursuant to Subtitle Z § 405.1, as soon as the application is accepted, the Office of Zoning shall refer the application to the Office of Planning, the Department of Transportation, and the Department of Energy and Environment for review and written reports.***

Department of Transportation (DDOT)

DDOT will submit a separate report to the record.

Department of Energy and Environment (DOEE)

The Dept. of Energy and Environment provided these comments to OP:

DOEE Development Review Comments  
ZC 20-33B: DC Archives on UDC Campus

**Greener Government Buildings Act Compliance – Net-Zero Energy & Electrification**

DOEE believes that, based on the information available in the applicant's exhibits, the project does not appear to comply with the [Greener Government Buildings Amendment Act of 2022](#), which requires District-owned and financed new construction and substantial improvement projects to be all-electric and adhere to net-zero energy (NZE) standards. According to this law, the project must be designed to comply with [Appendix Z of the DC Energy Conservation Code](#), which is the District's current, voluntary NZE building code. The law also prohibits the project from installing building systems that combust fossil fuels on-site (i.e., the building must be all electric), with the exception of backup power generators.

The Greener Government Buildings Act has been funded in the FY24 Budget Support Act, meaning it will be applicable beginning October 1, 2023. The law does not currently have any transitory provisions allowing for a phase-in of enforcement. DOEE is not responsible for enforcement of this law but cautions that the applicant may be unable to obtain a building permit from DOB if they cannot demonstrate that the building complies with the NZE standard.

All-electric, net-zero energy buildings are essential for the District to achieve its climate commitment to be carbon neutral by 2045. The [Clean Energy DC Building Code Amendment Act of 2022](#) calls for the District to adopt an NZE building code, by the end of 2026, that applies to the new construction or substantial improvement of any building subject to the Commercial Provisions of the DC Energy Conservation Code, including commercial buildings and residential buildings taller than 3 stories. The Greener Government Buildings Act calls for District-funded projects to lead the way and set the example for privately funded projects that will be held to the same standard, starting in 2027. DOEE urges the applicant to incorporate all-electric, net-zero energy design strategies in order to comply with this law.

### **Embodied Carbon Impact – Adaptive Reuse and Deconstruction**

The proposal to demolish the existing building and construct an entirely new building will have a far greater environmental impact than any of the three potential outcomes for Building 41 envisioned on the current UDC Campus Plan. The three current options involve adaptively reusing the Building 41, which would drastically reduce the project's embodied carbon footprint. Embodied carbon is the sum of all greenhouse gas emissions resulting from the construction of buildings, including materials and construction activities. It is estimated that 23% of the world's GHG emissions result from construction. Most of these embodied emissions are associated with the production and use of concrete and steel, common structural elements.

DOEE acknowledges the applicant's commitment to sustainable design strategies and LEED Gold certification, but notes that even a high-performance new construction project will take decades before the operational energy savings outweigh the upfront impacts of the building's construction and demolition of the existing building. DOEE encourages the applicant to conduct a life-cycle analysis (LCA) to measure the impact of the proposed project and to explore strategies to reduce the project's upfront embodied carbon impact. The following report from a DOEE grantee is an excellent local example of an LCA comparing the impacts of renovating vs. demolishing and rebuilding a DCPL library:

[Embodied Carbon Life Cycle Assessment for Southeast Neighborhood Library by Quinn Evans.](#)

The applicant cites aesthetic concerns and cost constraints as the reasons why adaptive reuse of the existing building is not viable. However, in general, adaptive reuse projects are able to achieve significant cost savings over new construction projects thanks to the avoided costs of new structural elements. If adaptive reuse is impossible and demolition of Building 41 is inevitable, DOEE encourages the applicant to explore options for deconstruction and reuse or salvage of materials from the existing building.

***101.14 Approval of a campus plan shall be based on the determination by the Zoning Commission that the application will be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps, and will not tend to affect adversely the use of neighboring property, in accordance with the Zoning Regulations and Zoning Maps, subject to the special conditions specified in this section.***

The proposed Campus Plan and the further processing for the DC Archives building would not be inconsistent with many of the Citywide and Area Elements of the Comprehensive Plan.

## **VII. ADVISORY NEIGHBORHOOD COMMISSION COMMENTS**

Currently, there is no report from ANC 3F in the record.

## **VIII. COMMUNITY COMMENTS**

There are letters in support at exhibits (Exhibits 14-22).

The Commission of Fine Arts [letter of approval](#) is at Exhibit 23C.